

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

PleasrDAO,

Plaintiff

v.

Martin Shkreli,

Defendant

Case No. 1-24-cv-04126-PKC-MMH

I, Martin Shkreli, hereby declare and state under penalty of perjury as follows:

1. I am the Defendant in the above-captioned action.
2. I submit this declaration in response to the Preliminary Injunction Order entered on August 26, 2024, which requires that I sequester and turn over all copies, in any form, of *Once Upon a Time in Shaolin* (the “Musical Work”) to defense counsel, and file an affidavit that I no longer possess any copies, in any form, of the Musical Work. ECF 30.
3. On August 23, 2024, my attorneys advised me that the Court ordered that I turn over all copies of the Musical Work to defense counsel.
4. On August 26, 2024, my attorneys advised me that the Court had issued a written order requiring that I “sequester and turn over” all copies, in any form, of the Musical Work to my attorneys. ECF 30.
5. I have searched my devices, electronic accounts, and other personal effects, and have identified the following copies of the Musical Work:

File Title	Location and Format
01 – Unknown Artist – Track 1.flac	Microsoft OneDrive, FLAC audio

02 – Unknown Artist – Track 2.flac	Microsoft OneDrive, FLAC audio
03 – Unknown Artist – Track 3.flac	Microsoft OneDrive, FLAC audio
04 – Unknown Artist – Track 4.flac	Microsoft OneDrive, FLAC audio
05 – Unknown Artist – Track 5.flac	Microsoft OneDrive, FLAC audio
06 – Unknown Artist – Track 6.flac	Microsoft OneDrive, FLAC audio
07 – Unknown Artist – Track 7.flac	Microsoft OneDrive, FLAC audio
08 – Unknown Artist – Track 8.flac	Microsoft OneDrive, FLAC audio
09 – Unknown Artist – Track 9.flac	Microsoft OneDrive, FLAC audio
10 – Unknown Artist – Track 10.flac	Microsoft OneDrive, FLAC audio
11 – Unknown Artist – Track 11.flac	Microsoft OneDrive, FLAC audio
12 – Unknown Artist – Track 12.flac	Microsoft OneDrive, FLAC audio
13 – Unknown Artist – Track 13.flac	Microsoft OneDrive, FLAC audio
14 – Unknown Artist – Track 14.flac	Microsoft OneDrive, FLAC audio
15 – Unknown Artist – Track 15.flac	Microsoft OneDrive, FLAC audio

6. Because of my recent time spent serving a criminal sentence, many of my personal effects were moved into storage. As a result, it is possible that I have been unable to exhaustively locate each and every copy of the Musical Work. In the event that I discover any additional copy of the Musical Work, I will promptly transfer said copy to my attorneys in the same manner as all other copies referenced here.

7. I transferred each of the copies identified in Paragraph 5 onto a USB stick, which I sent to my attorneys at the following address via hand delivery to:

Bochner PLLC
1040 Avenue of the Americas, 15th Floor
New York, NY 10018

8. I deleted each of the copies identified in Paragraph 5 from all of my electronic devices.

9. To the best of my knowledge, I do not have possession of any other copies of the Musical Work, in any form.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on Aug 30, 2024


boxSIGN 4LR2RJQL-189V7VZ6
Martin Shkreli